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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

Chapter 9

DC NO.: WW-13

Date: N/A
Time: N/A
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

APPLICATION FOR EX PARTE ORDER AUTHORIZING FRBP 2004 EXAMINATION
AND PRODUCTION OF DOCUMENTS
(YORAI "BENNY" BENZEEVI)

TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY

JUDGE:

1 TULARE LOCAL HEALTHCARE DISTRICT, dba TULARE REGIONAL MEDICAL
2 CENTER ("TRMC" or "Applicant"), Debtor in the above captioned Chapter 9 bankruptcy
3 proceeding, hereby files this Application for Ex Parte Order compelling Yorai "Benny"
4 Benzeevi, to produce certain documents for inspection and copying and, if requested, to
5 appear for a FRBP 2004 Examination.

6
7 **Yorai "Benny" Benzeevi**
8 **4924 Lakewood Drive**
9 **Visalia, CA 93291-9046**

10 Applicant represents as follows:

- 11 1. TRMC filed a voluntary Chapter 9 petition on September 30, 2017.
- 12 2. TRMC has reason to believe that Yorai "Benny" Benzeevi, who was the
13 Chief Executive Officer of Tulare Regional Medical Center, is in possession of
14 information needed by TRMC which affects the rights of TRMC as well as the
15 administration of this bankruptcy case.
- 16 3. TRMC believes that the information needed bears upon the acts,
17 conduct, or assets and liabilities of TRMC.
- 18 4. The examination will also relate to the operation of the TRMC's business
19 and the desirability of its continuance, the source of any money or property acquired or
20 to be acquired by TRMC for purposes of consummating a plan and the consideration
21 given or offered therefore, and any other matter relevant to the case or to the formation
22 of a plan.
- 23 5. Conducting such examination will assist TRMC in protecting its interests
24 in evaluating any plan that may be advanced and in furthering the administration of this
25 Chapter 9 case.
- 26 6. By this Application TRMC requests that it be permitted to examine Yorai
27 "Benny" Benzeevi and, if it chooses, compel the production of documentary evidence in
28 the manner provided in FRBP 9016.

WHEREFORE, Applicant prays as follows:

1 A. The Court enter Order pursuant to FRBP 2004 authorizing the examination
2 of Yorai "Benny" Benzeevi;

3 B. The Court enter an Order pursuant to FRBP 2004 authorizing the issuance
4 of a Subpoena for Rule 2004 Examination with Production of Documents; and

5 C. For such other and further relief as is just and proper.

6 Dated: December 14, 2017

WALTER WILHELM LAW GROUP,
a Professional Corporation

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9 By: 

Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District, dba
Tulare Regional Medical Center

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